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14 Attorneys for
Peter Rydell, et al.

15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 **In re:**

19 **PG&E CORPORATION,**

20 **&**

21 **PACIFIC GAS AND ELECTRIC
COMPANY,**

22 **Debtors.**

23 **Affects:**

- PG&E Corporation**
- Pacific Gas & Electric Company**
- Both Debtors**

24 ***All papers shall be filed in the Lead Case,**
25 **No. 19-30088 (DM).**

Case No. 19-30088
Chapter 11
(Lead Case)

**NOTICE OF MOTION AND MOTION FOR
ORDER AUTHORIZING WITHDRAWAL
OF COUNSEL; MEMORANDUM OF
POINTS AND AUTHORITIES**

1 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY
2 COURT JUDGE, AND ALL INTERESTED PARTIES:

3 PLEASE TAKE NOTICE that the Firms of COREY, LUZAICH, DE GHETALDI &
4 RIDDLE LLP, DANKO MEREDITH, and GIBBS LAW GROUP LLP, current attorneys of
5 record for Creditors, Peter Rydell, P.R., a minor child, and Peter Rydell DBA Lens Apiaries will
6 and hereby does move this Court for an Order Authorizing Withdrawal of Counsel in the
7 Bankruptcy case referenced above. This Motion is pursuant to the applicable Rules of
8 Procedure and is based upon this notice, the motion itself, the accompanying memorandum of
9 points and authorities, the declaration of Amanda L. Riddle, and the pleadings and documents
10 on file in this case.

11 PLEASE TAKE FURTHER NOTICE that, in accordance with Bankruptcy Local Rule
12 9014-1(3)(A), any objection to the requested relief, or a request for hearing on the matter, must
13 be filed with the Clerk of Court and served upon the initiating party within 21 days of mailing
14 the notice;

15 Any objection or request for a hearing must be accompanied by any declarations or
16 memoranda of law any requesting party wishes to present in support of its position;

17 If there is no timely objection to the requested relief or a request for hearing, the court
18 may enter an order granting the relief by default.

19 In the event of a timely objection or request for hearing, (either):

20 The initiating party will give at least seven days written notice of the hearing to the
21 objecting or requesting party, and to any trustee or committee appointed in the case.

22 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting
23 papers can be viewed and/or obtained: (i) by accessing the Court's website at
24 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450
25 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims
26 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-
27 4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-
28 mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents

1 on the Bankruptcy Court's website.

2 Dated: December 28, 2021

Respectfully submitted,

3 **COREY, LUZAICH, DE GHETALDI & RIDDLE LLP**

4
5 By: 
Amanda L. Riddle

6

7

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **I. RELEVANT FACTS**

10 COREY, LUZAICH, DE GHETALDI & RIDDLE LLP, DANKO MEREDITH, and
11 GIBBS LAW GROUP LLP ("Firm"), counsel of record for Creditors, Peter Rydell, P.R., a
12 minor child, and Peter Rydell DBA Lens Apiaries, respectfully submits this Motion for Order
13 Authorizing Withdrawal of Counsel ("Motion") pursuant to Rule 7007-1, 9013-1, 9013-2,
14 9013-3, and 9014-1 of the Bankruptcy Local Rules.

15 **A. In support of this Motion, the Firm represents as follows:**

16 On or around January 29, 2019, PG&E Corporation and Pacific Gas and Electric
17 Company ("Debtors") filed voluntary petitions for bankruptcy under Chapter 11 of Title 11 of
18 the United States Code, initiating bankruptcy case number 19-30088 in the Bankruptcy Court
19 for the Northern District of California ("Bankruptcy Case"). *Riddle Declaration.*, at ¶ 4.

20 On May 17, 2019, Peter Rydell signed a retainer agreement ("Agreement") on behalf of
21 himself and P.R., a minor child, and on September 23, 2019, Peter Rydell signed an Agreement
22 on behalf of Lens Apiaries with the Firm, engaging the Firm for legal representation in
23 connection with their legal action against PG&E Corporation and Pacific Gas and Electric
24 Company for damages caused by the Camp Fire. *Id.*, at ¶ 5.

25 On October 15, 2019, the Firm filed Claim No. 61207 on behalf of Peter Rydell, Claim
26 No. 70187 on behalf of P.R., a minor child, and Claim No. 61080 on behalf of Peter Rydell
27 DBA Lens Apiaries. *Id.*, at ¶ 6.

1 On December 20, 2019, the Firm filed Amended Claim No. 91580 on behalf of Peter
2 Rydell DBA Lens Apiaries. *Id.*, at ¶ 7.

3 In October of 2021, it became clear to the Firm that an irreparable and irreconcilable
4 breakdown in the attorney-client relationship had occurred. *Id.*, at ¶ 8-10.

5 Based on these circumstances, good cause exists for the Court to enter an Order
6 relieving the Firm as counsel of record for Peter Rydell, P.R., a minor child, and Peter Rydell
7 DBA Lens Apiaries

8 **II. ARGUMENT**

9 Pursuant to Rule 11-5 (a) of the Local Civil Rules in force in the Northern District of
10 California, “counsel may not withdraw from an action until relieved by order of Court after
11 written notice has been given reasonably in advance to the client and to all other parties who
12 have appeared in the case.” Furthermore, California’s professional ethics Standing Committee
13 has opined that when seeking leave of court to withdraw as counsel, it will “ordinarily...be
14 sufficient [for an attorney] to say only words to the effect that ethical considerations require
15 withdrawal or that there has been an irreconcilable breakdown in the attorney-client
16 relationship.” Formal Opinion No. 2015-192. In the case at bar, the existence of an irreconcilable
17 breakdown of the attorney-client relationship is manifest in the statements by Mr. Rydell as well
18 as the cease in communications by Mr. Rydell. This constitutes good cause for the Court to
19 grant leave for the Firm to withdraw as counsel of record.

20 **III. CONCLUSION**

21 For the foregoing reasons and for the reasons set forth in the Declaration of Amanda L.
22 Riddle, submitted in support of this Motion, the Firm respectfully requests that the Court enter
23 an Order granting the Firm leave to withdraw as counsel of record for Peter Rydell, P.R., a
24 minor child, and Peter Rydell DBA Lens Apiaries.

25 Dated: December 28, 2021

26 Respectfully submitted,

27 **COREY, LUZAICH, DE GHETALDI & RIDDLE LLP**

28 By: 
Amanda L. Riddle